AMENDMENT UNDER 37 C.F.R. § 1.116 Attorney Docket No.: Q76648

Application No.: 10/626,839

<u>REMARKS</u>

Claims 1-10 have been examined. Claims 1-9 have been rejected under 35 U.S.C. §

102(b). Also, the Examiner has indicated that claim 10 contains allowable subject matter.

I. Rejections under 35 U.S.C. § 102(b)

The Examiner has rejected claims 1-9 under 35 U.S.C. § 102(b) as allegedly being

anticipated by U.S. Patent No. 5,404,485 to Ban ("Ban").

A. Claim 1

Applicant submits that claim 1 is patentable over the cited reference. For example, in the

present invention, two areas, i.e., a data area and an alternative area are arranged on a memory.

In order to change the data of a data block recorded at an original address in the data area, the

data block having changed data is recorded in the alternative area. Additionally, in order to

change the data of the data block recorded in the alternative area, a data block having changed

data is recorded again at the original address in the data area.

Applicant submits that Ban fails to disclose the claimed method. For example, Ban is

directed towards a virtual mapping system that allows data to be continuously written to

unwritten physical address locations (Abstract). In Ban, however, an active unit and a transfer

unit do not constitute two separate areas which are arranged on a memory. Rather, a unit that

contains valid data is the active unit and a unit on which data is writable is a transfer unit. The

position of the transfer unit is not an original address of the data area.

Additionally, in the present invention, when changed data exists in the data area, since

the changed data always exists at the original address in the data area, there is no need to

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maintain mapping information. Accordingly, in the present invention, when changed data exists in the data area, the mapping information is deleted.

In the Ban reference, however, since there is no concept of an "original" address of the data area, and the address at which updated data is recorded is always different, the mapping information always has to be maintained where the update is located.

At least based on the foregoing, Applicant submits that claim 1 is patentable over the cited reference.

## В. Claims 2, 3 and 4

Applicant that claims 2, 3 and 4 are patentable at least by virtue of their dependency upon claim 1.

## C. Claims 5, 6 and 7

Since claims 5, 6 and 7 contain features that are analogous to the features recited in claim 1, Applicant submits that claims 5, 6 and 7 are patentable for at least analogous reasons as claim 1.

## D. Claims 8 and 9

Applicant submits that claims 8 and 9 are patentable at least by virtue of their dependency upon claim 7.

## II. Allowable Subject Matter

As set forth above, the Examiner has indicated that claim 10 contains allowable subject matter.

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III. Conclusion

In view of the above, reconsideration and allowance of this application are now believed

to be in order, and such actions are hereby solicited. If any points remain in issue which the

Examiner feels may be best resolved through a personal or telephone interview, the Examiner is

kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue

Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any

overpayments to said Deposit Account.

Respectfully submitted,

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